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Attorneys for Defendant CoreCivic

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

15 ATLP, a minor, by and through his Guardian
16 Ad Litem Tayloria Taylor; and AJB, a minor,
17 by and through his Guardian Ad Litem
Tayloria Taylor, and Tayloria Taylor as Co-
Special Administrator of the Estate of Brandon
Lavon Patton, Deceased.

Plaintiffs,

V.

20 CoreCivic, Inc., formerly Corrections
21 Corporation of America, a foreign corporation
d/b/a Nevada Southern Detention Center; Doe I
22 CoreCivic Employees I through XX; Does I
through X; and Roe Entities I through X,
inclusive.

Defendants.

Case No. 2:21-cv-02072-JCM-EJY

**STIPULATION AND
ORDER TO EXTEND DEADLINE
FOR CORECIVIC'S REPLY IN
SUPPORT OF MOTION FOR
JUDGMENT ON THE
PLEADINGS**

(Second Request)

25 Plaintiffs, Tayloria Taylor, as Co-Special Administrator of the Estate of Brandon
26 Patton, ATLP, and AJB (collectively, “Plaintiffs”), and Defendant, CoreCivic, Inc.
27 (“Defendant”), stipulate to extend the deadline for CoreCivic to file its Reply in Support of
28 Motion for Judgment on the Pleadings by one week from March 26, 2024 to April 2, 2024.

1 **I. Relevant Procedural History**

2 CoreCivic filed its Motion for Judgment on the Pleadings on February 16, 2024. (Dkt.
3 97.) The parties filed a Stipulation and (Proposed) Order to Extend Deadline for Plaintiffs'
4 Response to CoreCivic's Motion for Judgment on the Pleadings and CoreCivic's Reply in
5 Support on February 27, 2024. (Dkt. 98.) Plaintiffs requested an extension of the deadline to
6 file their Response from March 1, 2024 to March 8, 2024, and CoreCivic requested an
7 extension of the deadline to file its Reply to March 26, 2024, which the Court granted. (*Id.* at
8 1–2; Dkt. 99 at 2.) CoreCivic's current deadline to file its Reply is March 26, 2024.

9 **II. Good Cause Exists to Extend CoreCivic's Reply Deadline by One Week.**

10 Good cause exists to extend the deadline for CoreCivic to file its Reply in Support of
11 Motion for Judgment on the Pleadings. Due to numerous conflicting deadlines in other
12 matters, including preparing a Motion to Strike in *Militante v. CoreCivic, et al.*, No. CV-22-
13 00352-PHX-DWL (JFM) (D. Ariz.), preparing fact and expert witness disclosure statements
14 in *Taplin v. CoreCivic, et al.*, No. D-101-CV-2021-00896 (N.M.), preparing initial disclosures
15 in *Cleveland v. Wellpath, et al.*, No. 1:23-CV-03180-RMR-NRN (D. Colo.), and attending
16 multiple out-of-state depositions in *Angelo v. Wellpath, et al.*, No. 1:23-cv-01607-CNS-STV
17 (D. Colo.), CoreCivic requires additional time to review and analyze Plaintiffs' Response and
18 reply accordingly. CoreCivic also requires additional time for its Reply because undersigned
19 counsel was out-of-state on a pre-planned family vacation and recently returned to the office
20 on March 25, 2024. Good cause therefore exists to extend the deadline for CoreCivic to file
21 its Reply in Support of Motion for Judgment on the Pleadings.

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III. Conclusion

For the foregoing reasons, the parties respectfully request that the Court extend the deadline for CoreCivic to file its Reply in Support of Motion for Judgment on the Pleadings by one week from March 26, 2024 to April 2, 2024.

DATED this 26th day of March 2024.

STRUCK LOVE BOJANOWSKI & ACEDO, PLC

By /s/ Kristina R. Rood

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By /s/ Gia N. Marina

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IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: March 28, 2024

CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2024, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Paola Armeni
Gia N. Marina

I hereby certify that on this same date, I served the attached document by U.S. Mail, postage prepaid, on the following, who is not a registered participant of the CM/ECF System:

N/A

/s/ Kristina R. Rood